

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION – DETROIT**

**IN THE MATTER OF:**

Danny Marshall  
, Debtor(s).

---

CHAPTER 13

CASE NO. 19-51353-MLO

JUDGE MARIA L. OXHOLM

**TRUSTEE'S OBJECTIONS TO  
CONFIRMATION OF CHAPTER 13 PLAN**

**NOW COMES**, the Chapter 13 Trustee, Tammy L. Terry, and objects to confirmation of the Chapter 13 Plan in the above matter pursuant to E.D. Mich. L.B.R. 3015-3(a) and 11 U.S.C. §1307(c)(5) as follows:

1. The Trustee requests that the debtor provide copies of three (3) post-petition pay stubs at least 14 days prior to confirmation.

2. A review of the Debtors Schedule I indicates a retirement loan in the monthly amount of \$310.00. The Trustee requests the Debtor provide the specific date upon which this obligation will be paid in full. To the extent that this obligation will be paid in full during the pendency of the Chapter 13 case, the Trustee requests that best efforts be increased by the amount of the retirement loan payment in the month immediately following the month in which the obligation is paid in full.

3. The debtor's Plan fails to provide that all of the debtor's projected disposable income be utilized to fund the Plan. Specifically, the debtor's Schedule J has overstated the following expense(s) in contravention of 11 U.S.C. 1325(a)(3) and/or 11 U.S.C. 1325(b):

- a. Home Maintenance/Repairs - \$150.00.
- b. Water/Sewer - \$100.00.
- c. Medical/Dental - \$150.00.
- d. Recreation/Clubs - \$200.00.
- e. Vehicle Insurance - \$500.00.

The Trustee requests that the debtor provide proof of these expenses within fourteen days.

**WHEREFORE**, the Chapter 13 Trustee requests this Honorable Court deny confirmation of the debtor's (s') Chapter 13 Plan and dismiss this case pursuant to 11 U.S.C. §1307(c)(5).

OFFICE OF THE CHAPTER 13 TRUSTEE-DETROIT  
Tammy L. Terry, Chapter 13 Trustee

September , 2019

/S/ TAMMY L. TERRY (P-46254) 

Chapter 13 Standing Trustee

/s/ KIMBERLY SHORTER - SIEBERT (P-49608)

/s/ MARILYN R. SOMERS-KANTZER (P-52488)

Staff Attorneys

535 Griswold, Suite 2100

Detroit, MI 48226

(313) 967-9857

mieb\_ecfadmin@det13.net

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION - DETROIT

IN THE MATTER OF:

Danny Marshall  
, Debtor(s).

CHAPTER 13  
CASE NO. 19-51353-MLO  
JUDGE MARIA L. OXHOLM

CERTIFICATE OF MAILING

I hereby certify that on September 24, 2019, a copy of **TRUSTEE'S OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN** was electronically filed with the Clerk of Court, served electronically to the debtor's(s') attorney and a copy of same deposited in the U. S. Mail to the debtor (s) at the address as it appears below.

/s/ Terri Dooms

For the Office of the Chapter 13 Trustee-Detroit  
535 Griswold, Suite 2100  
Detroit, MI 48226  
(313) 967-9857  
mieb\_ecfadmin@det13.net

Danny Marshall Danny Marshall  
26768 Coronation Dr.  
Woodhaven MI 481830000

HS&A P.C.  
26676 WOODWARD AVE.  
ROYAL OAK MI 480670000